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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



Re.  
#2

RECEIVED  
JAN 04 1984

OFFICE OF  
SOLID WASTE AND EMERGENCY RESPONSE

Mr. Geoff Glanders  
URS Company  
3500 North Causeway Boulevard  
Metairie, Louisiana 70002

WASTE MANAGEMENT: WCBDF830137  
BRANCH

Dear Mr. Glanders:

I am writing in response to your letter of July 14, 1983 requesting additional clarification of the standards EPA employs in determining when a waste exhibits the characteristic of reactivity (40 CFR 261.23).

As you know, the Agency has not yet established numerical thresholds for toxic gas generation reactivity. However, until such time as thresholds are established you may use the following guidelines that Mr. Poppiti relayed to you:

1. If a waste contains less than 10 ppm sulfide or cyanide, assume that the waste does not pose a hazard due to reactivity.
2. For wastes containing concentrations greater than 200 ppm, the Agency believes that such wastes are likely to pose a hazard and should be identified as reactive wastes unless the generator can demonstrate otherwise.
3. For wastes containing between 10 and 200 ppm, no categorical statements can be made. Each waste must be evaluated against such factors as quantity and releasability of H<sub>2</sub>S or HCN and, in the case of complex cyanide containing wastes, the potential for conversion of relatively stable complex cyanide species to more reactive species.

In addition to the above considerations, other factors should also be considered in determining if a waste is a reactive waste. Specifically,

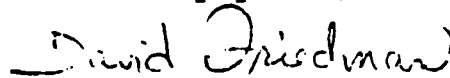
1. Has the waste ever caused injury to a worker because of H<sub>2</sub>S or HCN generation?
2. Have the OSHA workplace air concentration limits for either H<sub>2</sub>S or HCN been exceeded in areas where the waste is generated, stored or otherwise handled?

3. Have air concentrations of  $H_2S$  or HCN above a few ppm been encountered in areas where the waste is generated, stored or otherwise handled?

If any of the these questions can be answered - Yes - then you should consider the waste to be a hazardous waste.

I trust that this gives you a better understanding of the reactivity characteristic. Until completion of studies currently underway, we do not have available either more specific guidance or additional information on this issue. If, however, you have any other questions, give me a call at (202)382-4770.

Sincerely yours,



David Friedman  
Manager  
Waste Analysis Program

cc: Corson  
Poppiti  
Morse  
Hotline